



STANFORDS

ESTABLISHED 1879

**Colchester City Council Preferred Options Local Plan
Regulation 18 Consultation 2025**

Draft Planning Policy Comments For and on Behalf of Stanfords Colchester LLP

Section: 3

Policy ST1: Health and Wellbeing

While we support the principle that planning should consider health and wellbeing, the specific requirement in ST1 that:

“A Health Impact Assessment will be required for all residential development in excess of 50 units ... in order to demonstrate that the development would have an acceptable impact on health and wellbeing” is unfairly onerous, duplicative and unjustified.

1. Disproportionate and paperwork-heavy: Requiring a standalone Health Impact Assessment for every scheme above 50 dwellings risks becoming another piece of “tick-box” paperwork, rather than a meaningful planning tool. For most schemes at, or only modestly above, these thresholds:
 - The health and wellbeing implications are already captured within Planning Statements and Design and Access Statements, through consideration of access to services, open space, active travel, noise and other existing requirements.
 - Any specific localised issues (e.g. air quality, contamination, noise) are dealt with via the existing suite of technical reports.

ST1 does not explain why these existing mechanisms are insufficient, nor why a further, separate document is needed on top of them. This is directly at odds with national policy guidance that information requirements should be kept to the minimum necessary and be proportionate to the nature and scale of development.

2. No clear “marker” for acceptable impact: The policy requires that an HIA must “demonstrate that the development would have an acceptable impact on health

and wellbeing” and must set out how positive health benefits will be maximised and negative impacts avoided or mitigated. However, ST1:

- Provides no clear marker or benchmark as to what constitutes an “acceptable” health impact;
- Does not identify which methodology or assessment framework is to be used; and
- Offers no guidance on how the findings of an HIA would be weighed against other planning considerations, particularly on allocated sites where the principle of development is already established.

Without clear criteria, there is a real risk that HIA becomes a highly subjective exercise, producing lengthy narrative documents whose conclusions are difficult to challenge but add little to the robustness of decision-making. This undermines the effectiveness of the policy, as applicants cannot know in advance what is required to pass the “acceptable impact” test.

3. Risk of delay and double-counting on allocated sites: For allocated sites, including PP44 and its western parcel, many of the health-related issues are already picked up through:

- The spatial strategy and settlement hierarchy;
- Policies on open space, green networks, walking/cycling, design, climate and pollution; and
- The detailed site allocation criteria.

To then impose a mandatory HIA threshold risks double-counting the same issues and introducing another potential reason to delay determination or request further iterations of a document, without any clear added value. This sits uneasily with the plan’s reliance on allocations to deliver housing in a timely manner and risks making the plan ineffective in practice.

To be justified and proportionate, we request that ST1 is amended to:

- Limit mandatory HIAs to strategic-scale development where there is clear potential for significant health impacts (e.g. new settlements, major urban extensions), not all schemes above 50 units / 1,000sqm; and/or
- Recast the requirement so that: “Health and wellbeing considerations should be addressed in proportion to the scale and nature of the proposal, typically

within the Planning Statement and/or Design and Access Statement. A separate Health Impact Assessment will only be required where the development is of a strategic scale or where the Council can demonstrate that significant health impacts are likely and that an HIA is necessary to assess them.”; and

- Provide supporting text that clearly sets out:
 - The circumstances in which an HIA will be requested;
 - The methodology or framework to be used; and
 - How its conclusions will be taken into account alongside other material considerations.

Without these changes, ST1 introduces an additional, loosely defined document requirement that is likely to increase cost and delay for applicants, without clear evidence that it will improve outcomes over and above what is already achieved through existing policies, planning statements and design documents.